

MATTHEW J. KLUGER
ATTORNEY AT LAW

888 GRAND CONCOURSE, SUITE 1H
BRONX, NEW YORK 10451
(718) 293-4900 • FAX (718) 618-0140
www.klugerlawfirm.com

May 21, 2023


By ECF

Honorable Ronnie Abrams
U.S. District Judge
Southern District of New York
40 Foley Square
New York, N.Y. 10007

Application granted.

SO ORDERED.

Re: United States v. Angela Rodriguez
20 Cr. 39 (RA)



Ronnie Abrams, U.S.D.J.
May 22, 2023

Dear Judge Abrams,

Bail in this matter was set by Magistrate Judge Katharine H. Parker on November 14, 2019. Among other conditions of her bail, Ms. Rodriguez's travel is limited to the Southern and Eastern Districts of New York. Ms. Rodriguez writes now respectfully seeking the Court's permission to take a short vacation with her daughter to Puerto Plata in the Dominican Republic from May 26, 2023 to May 30, 2023.¹

As the Court may recall, Ms. Rodriguez successfully graduated from the Young Adult Opportunity Program on September 6, 2022. Currently we are in discussions with the Government and Pretrial Services regarding a final resolution to this matter. In the meantime, Ms. Rodriguez has been going to school, taking care of her daughter, and growing her cake business. Needless to say, Ms. Rodriguez has remained of good behavior and complaint with all orders of the Court since her arrest in 2019.

Should the Court grant this request, the defense respectfully requests that Ms. Rodriguez be allowed to retrieve her passport from Pretrial Services before she leaves, with the understanding that she will return the passport to Pretrial Services immediately upon her return.²

U.S. Pretrial Services Officer Shawn Bostic has no objection to this request and A.U.S.A. Samuel Rothchild defers to the judgment of Pretrial.

Thank you for the Court's consideration.

¹ Should the Court approve this request, more specific hotel and flight information will be provided to Pretrial Services. Also, because Ms. Rodriguez's flight leaves from Newark Airport, the defense seeks permission for Ms. Rodriguez to travel to the District of New Jersey as well.

² Ms. Rodriguez has previously taken a trip to Mexico under similar circumstances without incident.

Respectfully submitted,

/s/ Matthew J. Kluger
Matthew J. Kluger, Esq.
Attorney for Angela Rodriguez

cc: AUSA Samuel P. Rothschild
PTSO Dayshawn Bostic